

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MURRAY RUBINSTEIN, JEFFREY F. ST.)	
CLAIR, WILLIAM MCWADE, HARJOT)	
DEV and VIKAS SHAH, Individually and On)	Case No. 1:14-cv-9465
Behalf of All Others Similarly Situated,)	
)	Judge Robert M. Dow, Jr.
Plaintiffs,)	
)	Magistrate Judge Maria Valdez
v.)	
)	
RICHARD GONZALEZ and ABBVIE INC.,)	
)	
Defendants.)	

PLAINTIFFS' AMENDED MOTION FOR CLASS CERTIFICATION

Lead Plaintiffs Dawn Bradley (“Bradley”) and Vikas Shah (“Shah”), by and through their undersigned attorneys, respectfully move the Court for an order granting class certification. In support of their motion, Plaintiffs respectfully state as follows:

1. Pursuant to Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure, Plaintiffs respectfully move this Court for an Order allowing this action to proceed as a class action on behalf of a proposed class (the “Class”) comprised of all persons who purchased or otherwise acquired American Depository Shares or “ADS” or purchased call options or sold put options (collectively, “Securities”) of Shire plc (“Shire”) during the short period between September 29 and October 14, 2014, inclusive (the “Class Period”).

2. Plaintiffs also move for Plaintiff Bradley to be appointed as the Class Representative and request that her counsel, Gardy & Notis, LLP and Wolf Haldenstein Adler Freeman & Herz LLP be appointed Class Counsel.¹

¹ On February 4, 2015, the Court appointed Plaintiffs as Lead Plaintiffs pursuant to Section 21d(A)(3)(B) of the

3. This motion is supported by Plaintiffs' Memorandum of Law (Dkt. No. 105) and the Expert Report of Chad Coffman, CFA (Dkt. 106) as well as the other pleadings in this action.

4. In short, the proposed Class is numerous, common questions of fact and law clearly predominate, the Plaintiffs' claims are typical of the Class' claims, the Plaintiffs are adequate class representatives, and a class action is a superior method of managing and resolving this dispute.

WHEREFORE, Lead Plaintiffs respectfully request that this Court certify this action as a class action under Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the above-defined plaintiff Class, designate Lead Plaintiff Bradley as the Class Representative, appoint Plaintiffs' counsel, Gardy and Notis, LLP and Wolf Haldenstein Adler Freeman & Herz LLP, as co-lead class counsel, and grant any further relief as the Court deems just and proper.

Dated: February 16, 2018

Respectfully submitted,

/s/ Mark C. Rifkin

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Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(3)(B), and approved Lead Plaintiffs' selection of Gardy & Notis and Wolf Haldenstein as Co-Lead Counsel. *See* Dkt. No. 12.

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